## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

A.A.R.P., et al., on their own behalf and on behalf of others similarly situated,

Petitioners—Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*,

Respondents-Defendants.

Case No. \_ 1:25-cv-0059

PETITIONERS-PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYMS

## PETITIONERS-PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYMS

Petitioners-Plaintiffs A.A.R.P. and W.M.M., through undersigned counsel, hereby respectfully moves this Court to: (1) allow them in the above-referenced action to proceed pseudonymously (using initials A.A.R.P. and W.M.M.); (2) ensure that they be referred to by their initials on the docket, in all pleadings and other documents related to this litigation, and in all proceedings held before this Court; and (3) prohibit Respondents-Defendants ("Respondents") from disclosing any personally-identifying information that could lead to Petitioner's identification. Petitioners are filing an accompanying Memorandum of Law in support of this motion, as well as a Proposed Order for the Court.

WHEREFORE, Petitioners respectfully request that this Court:

1. Allow them to proceed pseudonymously in this action (using initials A.A.R.P. and W.M.M.)

- 2. Ensure that Petitioners are referred to by their initials on the docket, in all pleadings and other documents related to this litigation, and in all proceedings held before this Court;
- 3. Prohibit Respondents from disclosing any personally-identifying information that could lead to Petitioners' identification; and
- 4. Grant any other relief that the Court deems necessary and just.

Respectfully submitted, Dated: April 16, 2025

Lee Gelernt\* Daniel Galindo\* Ashley Gorski\* Patrick Toomey\* Sidra Mahfooz\* Omar Jadwat\* Hina Shamsi\*

AMERICAN CIVIL LIBERTIES UNION

FOUNDATION

125 Broad Street, 18th Floor New York, NY 10004 T: (212) 549-2660

F: (212) 519-7871 E: lgelernt@aclu.org E: dgalindo@aclu.org E: agorski@aclu.org E: ptoomey@aclu.org E: smahfooz@aclu.org

E: ojadwat@aclu.org

E: hshamsi@aclu.org

Noelle Smith\*

Oscar Sarabia Roman\*

My Khanh Ngo\* Cody Wofsy\*

AMERICAN CIVIL LIBERTIES UNION

**FOUNDATION** 

425 California Street, Suite 700

San Francisco, CA 94104

T: (415) 343-0770

/s/Brian Klosterboer Brian Klosterboer Tx Bar No. 24107833 Thomas Buser-Clancy\* TX Bar No. 24078344 Savannah Kumar\* TX Bar No. 24120098

Charelle Lett\*

TX Bar No. 24138899

Ashley Harris\*

TX Bar No. 24123238

Adriana Piñon\*

TX Bar No. 24089768

ACLU FOUNDATION OF TEXAS, INC.

1018 Preston St. Houston, TX 77002 (713) 942-8146

bklosterboer@aclutx.org tbuser-clancy@aclutx.org skumar@aclutx.org clett@aclutx.org

aharris@aclutx.org apinon@aclutx.org

Attorneys for Petitioner-Plaintiff

\*Pro hac vice applications forthcoming

F: (212) 519-7871 E: nsmith@aclu.org E: osarabia@aclu.org E: mngo@aclu.org E: cwofsy@aclu.org

## **CERTIFICATE OF CONFERENCE**

I certify that pursuant to LR 7.1(a), Petitioners' counsel attempted to confer with counsel for Respondents prior to filing by emailing Chad E. Meacham, the United States Attorney for the Northern District of Texas, and seeking the government's position. Petitioners' counsel was not able to obtain a response prior to filing.

Dated: April 16, 2025

/s/ Brian Kosterboer
Brian Klosterboer
ACLU FOUNDATION OF TEXAS,
INC.
1018 Preston St.
Houston, TX 77002
(713) 942-8146
Bklosterboer@aclutx.org

Attorney for Petitioners- Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2025, a true and correct copy of the foregoing document was electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record. I provided copies of the foregoing motion, declaration, and accompanying memorandum and proposed order via email to the U.S. Attorney's Office, Northern District of Texas to:

United States Attorney's Office Northern District of Texas Chad Meacham Abilene Office 325-271-6700 500 Chestnut Street, Suite 601 Abilene, TX 79602 CMeacham@usa.doj.gov

Dated: April 16, 2025

/s/ Brian Kosterboer
Brian Klosterboer
ACLU FOUNDATION OF TEXAS,
INC.
1018 Preston St.
Houston, TX 77002
(713) 942-8146
Bklosterboer@aclutx.org

Attorney for Petitioners- Plaintiffs